

8/6/13
SW/JDP USAO#2013R00774

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

CLERK'S OFFICE
AT BALTIMORE

v.

BY _____ DEPUTY

CRIMINAL NO. **JFM-13-0678**

MICHAEL WESLEY LEE,
a/k/a "King P",

Defendant.

(Use of Interstate Facility to Promote
and Facilitate Prostitution Business,
18 U.S.C. § 1952(c); Coercion and
Enticement, 18 U.S.C. § 2422(a);
Interstate Transportation for
Prostitution, 18 U.S.C. § 2421(a);
Aiding & Abetting, 18 U.S.C. § 2)

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. Defendant **MICHAEL WESLEY LEE, a/k/a "King P"**, was born in 1984 and lived in various locations to include New York City, New York and Odenton, Maryland.

2. **LEE** is a pimp who used social media websites such as "Tagged" and "Backpage" to persuade and entice females to engage in commercial sex acts for his personal financial benefit. **LEE** used coercion, force and threats of force to maintain control over the females. **LEE** posted and advertised commercial sex services on Backpage and used Tagged to communicate regarding his prostitution business.

3. In or about August 2013, the defendant persuaded, induced, and enticed a female (hereinafter referred to by the initial "S") to travel from Missouri to Maryland for the purpose of

engaging in prostitution. On or about August 9, 2013, LEE arranged for the transportation of "S" from Missouri to Maryland with the intent that "S" engage in prostitution.

The Charge

4. Beginning at least in 2012 and continuing through August 26, 2013, in the District of Maryland, the Eastern District of Missouri, the Southern and Eastern Districts of New York and elsewhere, the defendant,

MICHAEL WESLEY LEE, a/k/a "King P",

traveled in interstate and foreign commerce and used a facility in interstate and foreign commerce, namely the Internet and cellular telephones, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a business enterprise involving prostitution in violation of the laws of the State of Maryland, to include MD Code, Criminal Law, §§ 11-303, 11-304, and of the United States, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

18 U.S.C. § 1952(c)
18 U.S.C. § 2

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 3 of Count One are incorporated by reference here.

2. In or about August 2013, in the District of Maryland, the Eastern District of Missouri, and elsewhere, the defendant,

MICHAEL WESLEY LEE a/k/a "King P",

did knowingly persuade, induce, entice, and coerce an individual, that is, "S", to travel in interstate commerce to engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. § 2422(a)

18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

1. The allegations contained in Paragraphs 1 through 3 of Count One are incorporated here.

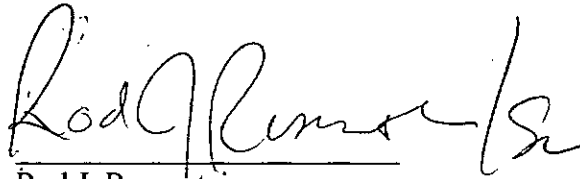
2. On or about August 10, 2013, in the District of Maryland, the Eastern District of Missouri and elsewhere, the defendant,

MICHAEL WESLEY LEE a/k/a "King P",

did knowingly and intentionally transport, and aid and abet the transportation of an individual, that is, "S", in interstate commerce with the intent that such individual engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. § 2421

18 U.S.C. § 2



Rod J. Rosenstein
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Foreperson

Date: 12/11/2013